REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments. Claims 1-4, 7-13, 15, 16 and 18-23 remain pending in the case. Claims 1-4, 6-13 and 15-23 are rejected. Claims 6 and 17 are cancelled herein without prejudice. Claims 1, 4, 7, 8, 10, 13, 15, 16, 18, 19, 21 and 23 are amended herein. No new matter has been added.

35 U.S.C. § 102(b)

Claims 1-4, 10-13, 15 , 16 and 21-23 stand rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent 5,887,145 by Harari et al., hereinafter referred to as the "Harari" reference. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 1-4, 10-13, 15, 16 and 21-23 are not anticipated by Harari in view of the following rationale.

Applicants respectfully direct the Examiner to independent Claim 1 that recites that an embodiment of the present invention is directed to (emphasis added):

> An intermediary apparatus adapted to be communicatively coupled with an electronic device, said electronic device having an externally disposed accessible slot, said intermediary apparatus comprising:
>
> a first module having an opening, said first module adapted to be communicatively coupled with said electronic device, said first module adapted to receive a second module,

said first module comprising a wireless communication device;

a controller coupled with said first module, said controller for controlling communication between said first module and said second module, provided said second module is inserted into said first module, said second module comprising a compact memory device;

a first electrical connector coupled with said first module, said first electrical connector adapted to enable communication between said first module and said electronic device; and

a second electrical connector coupled with said first module, said second electrical connector adapted to enable communication between said first module and said second module, provided said second module is inserted into said first module.

Independent Claims 10 and 21 recite similar limitations. Claims 2-4 that depend from independent Claim 1, Claims 11-13, 15 and 16 that depend from independent Claim 10, and Claims 22 and 23 that depend from independent Claim 21 provide further recitations of the features of the present invention.

Harari and the claimed invention are very different. Applicants understand Harari to teach a removable mother/daughter peripheral card for use in a personal computer. Applicants understand Harari to teach a peripheral card where the mother card contains common functional components of a number of peripherals, and the daughter card contains the rest of the functional components. (col. 4, lines 22-26). In particular, Harari does not teach, describe or suggest that the mother card includes a wireless communication device.

With reference to Figure 3 of Harari, and the accompanying description, the functional components of the mother card are shown. Controller 40 includes host interface 54 for interfacing with a host system and memory interface 56 for interfacing with a flash memory. Specifically, the host interface communicates with the host system in accordance with the PCMCIA standard or any other standard card interface (col. 7, lines 52-57). Applicants respectfully assert that nowhere does Harari teach, describe or suggest a mother card including a wireless communication device, as claimed.

In contrast, embodiments of the claimed invention are directed towards an intermediary apparatus including a first module, "said first module comprising a wireless communication device" (emphasis added). With reference to Figure 7A of the present application, intermediary apparatus 2001 includes communication device 108B, where communication device 108B is a wireless communication device (page 32, line 24 through page 33, line 2).

Applicants respectfully assert that Harari in particular does not teach, disclose, or suggest an intermediary apparatus including a first module, "said first module comprising a wireless communication device" as claimed. Therefore, Applicants respectfully assert that nowhere does Harari teach, disclose or suggest the claimed embodiments of the present invention as recited in independent Claims 1, 10 and 21, and that these claims are thus in a condition for allowance. Therefore, Applicants respectfully submit the Harari

also does not teach or suggest the additional claimed features of the present invention as recited in Claims 2-4 that depend from independent Claim 1, Claims 11-13, 15 and 16 that depend from independent Claim 10, and Claims 22 and 23 that depend from independent Claim 21. Therefore, Applicants respectfully submit that Claims 2-4, 11-13, 15, 16, 22 and 23 overcome the rejection under 35 U.S.C. § 102(b), and are in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103(a)

Claims 9 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Harari. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 9 and 20 are not anticipated by Harari in view of the following rationale.

As described above, independent Claims 1 and 10, upon which Claims 9 and 20, respectively, depend from, are directed toward an intermediary apparatus including a first module, "said first module comprising a wireless communication device." Applicants respectfully assert that nowhere does Harari teach, describe or suggest a mother card including a wireless communication device, as claimed.

In contrast, as described above, Applicants understand Harari to teach a mother/daughter peripheral card where the mother card does not include a

wireless communication device. Harari does teach that the daughter card may be a magnetic hard disk, a network adapter, or a modem or other communication device peripheral. However, Harari teaches that the mother/daughter peripheral card is implemented such that the mother card contains common functional components of a number of peripherals, and the daughter card contains the rest of the functional components (col. 4, lines 22-26). Specifically, Harari teaches that locating the common functional components to a comprehensive mother card requires fewer components on the individual peripheral daughter card.

Applicants respectfully assert that wireless communications functionality is not common to the peripheral devices (e.g., magnetic hard disks) as described in Harari. On the contrary, wireless communication is specialized function of particular peripheral device. By teaching that common functional componentry for a number of peripherals resides on the mother card, and that the components necessary for implementing wireless functionality are on a daughter card, Applicants respectfully assert that Harari teaches away from the invention as claimed. Applicants respectfully assert that nowhere does Harari teach, disclose or suggest the present invention as recited in Claims 9 and 20, and that these claims are thus in condition for allowance.

Claims 7, 8, 18 and 19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Harari in view of United States Patent 6,377,218 by Nelson et

al., hereinafter referred to as the "Nelson" reference. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 7, 8, 18 and 19 are not anticipated by the combination of Harari and Nelson in view of the following rationale.

The combination of Harari and Nelson does not teach a docking system as claimed. For instance, Harari and the claimed invention are very different. Applicants understand Harari to teach a mother/daughter peripheral card. However, as described above, Applicants respectfully assert that Harari does not teach, describe or suggest a mother card including a wireless communication device, as claimed.

While Harari does teach that the daughter device may be a modem or other communication device peripheral, by teaching that common functional componentry for a number of peripherals resides on the mother card, and that the components necessary for implementing wireless functionality are on a daughter card, Applicants respectfully assert that Harari teaches away from the mother module including a wireless communication device. Specifically, Harari teaches that use of a peripheral modem device requires functional componentry located on both the mother card and the daughter card.

Moreover, the combination of Harari and Nelson fails to teach or suggest this claim limitation because Nelson does not overcome the shortcomings of

Harari. Applicants understand Nelson to teach a device for providing an antenna, a receptacle, and a physical connector on a PCMCIA card. In particular, Nelson teaches a PCMCIA card capable of providing wireless communications.

As described in Harari, the mother card does not comprise wireless communication functionality. Specifically, the mother card only includes componentry that is common to a number of peripheral devices. Each particular peripheral device includes the extra componentry needed to implement its specific functionality. For example, a modem peripheral includes the extra componentry necessary to implement a modem. As taught in Harari, one of the daughter card peripheral devices may be a modem or other communication device.

However, Applicants understand Nelson to teach a PCMCIA card that already has wireless communication functionality. Therefore, Applicants respectfully assert that there would be no motivation to combine the references in such a way as to arrive at the claimed invention. There is only a need for a single wireless communication device. Since the first module and second module are coupled to a second electrical connector adapted to enable communication between the first module and the second module, there is no need for wireless communications functionality between the first module and second module. Accordingly, the combination of Harari and Nelson would

provide the redundancy of two wireless communications devices, resulting in extra componentry at an extra cost. By teaching a mother/daughter peripheral card with common functional components on a comprehensive mother card such that each individual peripheral will have less components, thereby reducing cost (col. 4, lines 30-33), Harari teaches away from the combination with Nelson.

Applicants respectfully assert that nowhere does the combination of Harari and Nelson teach, disclose or suggest the present invention as recited in independent Claims 1 and 10, and that these claims are thus in condition for allowance. Therefore, Applicants respectfully submit the combination of Harari and Nelson also does not teach or suggest the additional claimed features of the present invention as recited in Claims 7 and 8 dependant on allowable base Claim 1 and Claims 18 and 19 dependant on allowable base Claim 10.

CONCLUSION

Based on the amendments and arguments presented above, Applicants respectfully assert that Claims 1-4, 7-13, 15, 16 and 18-23 are allowable and, therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account No. 23-0085.

Respectfully submitted,

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